

Application No. 10/764,745  
Amendment "A" dated October 14, 2005  
Reply to Office Action mailed July 15, 2005

### REMARKS

#### 1. Claims

The first Office Action of July 15, 2005, considered and rejected claims 1-20, and objected to claim 17. Claim 17 was objected on the basis of an informality in the claim, while claim 7 was rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the applicant regards as the inventions, as a result of a minor grammatical informality. The informalities of claims 7 and 17 have been fixed by amendment. Accordingly, Applicants respectfully submit that the objection to claim 17, and the rejection of claim 7, have been overcome.

Claims 1-17, and 19, and 20 were rejected under 35 U.S.C. 103(a) as being unpatentable over Rappoport et al. (WO 98/36630). Claim 18 was rejected as being unpatentable and obvious under 35 U.S.C. 103(a) over Rappoport in view of Betrisey et al. (U.S. Publication No. 2001/00448764 A1).<sup>1</sup>

By this paper, claims 1, 19, and 20 have also been amended, and claims 21-24 have been added.<sup>2</sup> Accordingly, following this paper, claims 1-24 are pending. Of these claims, claims 1, 19, and 20 are the only independent claims at issue.

As reflected in the claims listing above, claim 1 is generally directed to a method for accessing a scaled font and synthesizing a font variant. As recited, this method includes accessing a font file having a plurality of glyphs, each of the plurality of glyphs storing glyph features, and utilizing the font file in accessing a scaled font that has been scaled for rendering at a target size and target resolution. Further, claim 1 recites accessing one or more external font parameters that alter how glyphs of the scaled font should be rendered and applying the one or

<sup>1</sup> Although the prior art status and some of the assertions made with regard to the cited art is not being challenged at this time, Applicants reserve the right to challenge the prior art status and assertions made with regard to the cited art, as well as any official notice, which was taken in the Office Action, at any appropriate time in the future, should the need arise, such as, for example in a subsequent amendment or during prosecution of a related application. Accordingly, Applicants' decision not to respond to any particular assertions or rejections in this paper should not be construed as Applicant acquiescing to said assertions or rejections.

<sup>2</sup> Support for the claim amendments, including amendments related to accessing a font file having a plurality of glyphs, each glyph storing its features, are clearly supported by Figure 1 and paragraphs [0030]-[0032], among other passages throughout the specification. Support for new the new claims can be found in Figures 3A and 3B, and paragraphs [0030], [0043]-[0046], and [0052-0054] of the specification. Accordingly, it is respectfully submitted that the amendments to the claims, and the addition of new claims, do not add new matter, and entry thereof is respectfully submitted.

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more external font parameters to the scaled font to synthesize a font variant such that hints from the scaled font are preserved in the font variant.

Claims 19 is directed to a similar method being performed by a computer program product, while claim 20 is directed to a similar method as performed within a computing system.

Rappoport is generally directed to font models in which features of a glyphs within the font can be dynamically changed by altering a single feature. However, Rappoport fails to disclose or suggest the method recited in the pending claims. For example, among other things, Rappoport fails to disclose or suggest accessing a font file having a plurality of glyphs, each of the plurality of glyphs storing glyph features, as claimed.

Although Rappoport discloses fonts having glyph features, and that such features are stored, it does not disclose a font file having a plurality of glyphs, each of the plurality of glyphs storing the glyph features. In particular, Rappoport discloses one embodiment of a font model 100 in which a "feature store" is used to store features of glyphs, such that the glyphs do not store the features.<sup>3</sup> Page 24, ln. 7-25. Rappoport does appear to disclose that each glyph may have "underlying geometry 10 and [a] feature hierarchy 14...compris[ing] a plurality of features;" however the reference also discloses that glyph features are stored in a "'feature store' common to all glyphs in the font...rather than inside every glyph." Page 24, ln. 1-19. As a result, the glyph "does not store its underlying geometry [or] its features." Page 24, ln. 7-9. In this manner, by changing a single a feature in the feature store, all glyphs pointing to the same feature can be modified accordingly.

Thus, Rappoport teaches a font model in which glyph features are stored external to the glyphs, rather than having the glyphs store glyph features. As a result, Rappoport fails to disclose or suggest a font file comprising a plurality of glyphs, each of the plurality of glyphs storing glyph features. Thus, Rappoport fails to anticipate or make obvious the method recited in claim 1 of the present application, particularly in combination with the other recited claim elements.

Although the foregoing arguments related specifically to claim 1, it will be appreciated that, for at least the foregoing reasons, all of the other rejections and assertions of record with

<sup>3</sup> While the reference also discloses a font model 10, font model 10 appears to be merely a glyph model of a single glyph, and does not contain a plurality of glyphs, as claimed. See page 23, ln. 25-28.

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respect to the independent and dependent claims are now moot, and therefore need not be addressed individually. Nevertheless, for the record, Applicants will address some of the new claims that depend from claim 1.

For example, with regard to claim 21, Rappoport does not teach or suggest determining that one or more gaps between the glyphs of the scaled font should be modified. In fact, with regard to features and geometries of a single glyph, Rappoport appears to teach only the use of control points and support constructs to define glyph boundaries and geometries, rather than separation between glyphs. See page 12, ln. 14-20; Figs. 3A-3B. For example, various support lines may identify glyph features (e.g. bars, baselines, serifs, stems, joints, bows). Page 12, ln. 14-17. However all such constructs define the glyph or an italic version of the glyph, and do not identify gaps between glyphs. *Id.* Although it may be possible to use these geometry and feature constructs to define separations between glyphs, it will be appreciated that this is quite different than a method in which it is determined that gaps between glyphs should be modified, as claimed.

Next, with regard to claim 24, it is recited that accessing the one or more external font parameters includes accessing at least one of a glyph expansion or compression percentage indicative of a glyph expansion or compression. The cited disclosure in Rappoport also fails to suggest or disclose this limitation. In particular, the cited reference merely illustrates that an angle and/or bar width of a glyph can be modified. See Fig. 5. While it appears that modifying an angle if the letter "A" can effectively expand or compress the letter, a change in angle is quite different than accessing a percentage of glyph expansion or compression.

Accordingly, for at least the foregoing reasons, Applicants respectfully submit that the pending claims (1-24) are in condition for immediate allowance over the art of record.

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## 2. Specification

In the Office Action, the Examiner reminded the Applicants of the duty to bring to the attention of the examiner information within their knowledge as to other copending United States applications which are "material to patentability." See 37 C.F.R. § 1.56; M.P.E.P. § 2001.06(b).

Although Applicants do not necessarily think that these copending applications should be considered material to patentability of this case, Applicants will submit an Invention Disclosure Statement (IDS) identifying the United States applications identified by the Examiner, as well as other references associated with such applications out of an extreme abundance of caution and due to the fact that the Examiner has apparently expressed that he feels that the identified copending cases are material to patentability.<sup>4</sup>

The Examiner has stated that the specification of the present application must also be amended to identify the identified copending applications. Applicants respectfully disagree.

As noted in M.P.E.P. § 2001.06(b), the duty of disclosure under 37 C.F.R. § 1.56, with respect to copending applications, is to "bring such other applications to the attention of the examiner." M.P.E.P. § 2001.06(b). Applicants have not found, and Examiner has not cited, any requirement under which copending applications must also be identified in the specification. Accordingly, the specification has not been amended as requested by the Examiner. However, Applicants specifically call the Examiner's attention to the U.S. Patent Ser. Nos. 10/764,961, 10/764,787, and 10/764,622, and the other references identified in the IDS submitted herewith.

Accordingly, Applicants respectfully submit that the specification as filed, and pending claims 1-24, are in condition for immediate allowance. In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

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<sup>4</sup> Applicants note, for the record, that they do not believe the copending applications are, in fact, material to patentability, inasmuch as the other references do not qualify as prior art (having been filed on the same day) and do not present claims that are patentably indistinct. Nonetheless, out of the abundance of caution suggested in M.P.E.P. § 2004, ¶ 9 (i.e. recommending calling the Examiner's attention even if a reference only "might" be material to patentability), Applicants specifically call the Examiner's attention to the references noted in the IDS that will be submitted at or about the same time as this response. Nevertheless, submission of the IDS should not be construed as Applicants' acquiescence that such applications and references are, in fact, material to patentability of the present application.

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Respectfully submitted,



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